

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

Frederick Dandridge	Chapter 13
Debtor	Bankruptcy No. 16-18688-MDC
Lakeview Loan Servicing, LLC, or its Successor or Assignee	
Movant	
vs.	
William C. Miller, Esq, Trustee Frederick Dandridge	
Respondents	

**MOTION OF LAKEVIEW LOAN SERVICING, LLC, OR ITS SUCCESSOR OR ASSIGNEE FOR
RELIEF FROM AUTOMATIC STAY UNDER § 362(a)**

Movant: Lakeview Loan Servicing, LLC, or its Successor or Assignee

Note and Mortgage dated May 12, 2015 and recorded in the Office of the Recorder of Delaware County in Mortgage Book 05649 Page 0415.

Assignment of Mortgage dated November 1, 2017 and recorded in the Office of the Recorder of Delaware County in Mortgage Book 06091 Page 1118.

1. Lakeview Loan Servicing, LLC, or its Successor or Assignee (hereinafter "Movant") holds a claim secured by a duly recorded Mortgage on property of Frederick Dandridge, or of the bankruptcy estate located at: 381 E Madison Avenue, Clifton Heights, Pennsylvania 19018.

2. Frederick Dandridge (hereinafter "Debtor") filed a Petition under Chapter 13 on December 20, 2016.

3. As of January 1, 2019, the Mortgage requires payments each month of \$1,330.81.

4. Movant has not received regular mortgage payments and lacks adequate protection of its interests.

5. Debtor is in default of post-petition payments to the present date from November 1, 2018.

6. The total amount of the post-petition arrearage as of this date is \$3,922.23. This figure is broken down as follows:

-Three (3) delinquent payments, each in the amount of \$1,330.81 representing the months of October 2018 through January 2019

-Less suspense balance of \$70.20

7. As of January 1, 2019, Movant has incurred attorneys' fees in connection with this Motion.

8. Movant does not have and has not been offered adequate protection for its interest in said premises and may be required to pay expenses for said premises in order to preserve its lien, which is the obligation of the Debtor under said Mortgage.

9. Movant specifically requests permission from the Honorable Court to communicate with the Debtor and Debtor's counsel to the extent necessary to comply with applicable nonbankruptcy law.

WHEREFORE, Movant prays for an order modifying the automatic stay of Bankruptcy Code §362(a) to permit Movant to exercise applicable state court remedies with respect to the mortgage property and for such relief as this Court deems necessary and appropriate.

/s/ Francis T. Tarlecki, Esquire

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